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THOMAS G. BRUTON

CLERK, U.S. DISTRICT COURT

**BEFORE THE UNITED STATES JUDICIAL PANEL
ON MULTIDISTRICT LITIGATION**

**IN RE: FACEBOOK, INC., CONSUMER
PRIVACY USER PROFILE
LITIGATION**

MDL DOCKET NO. 2843

**CA AND SCL DEFENDANTS' RESPONSE IN SUPPORT OF
PLAINTIFFS' MOTION TO TRANSFER RELATED CASES
FOR CONSOLIDATED PRETRIAL PROCEEDINGS**

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I. INTRODUCTION

Defendants Cambridge Analytica LLC (“Cambridge Analytica”), Cambridge Analytica Holdings LLC, Cambridge Analytica Political LLC, Cambridge Analytical Commercial LLC, Cambridge Analytica (UK) Ltd. (collectively, the “CA Defendants”), and Defendants SCL Elections Ltd., SCL Group Limited, and SCL USA Inc. (collectively, the “SCL Defendants”) respectfully submit this response in support of Plaintiffs Beiner and Haubert’s Motion for Transfer of Actions to the Northern District of California and for Consolidation Pursuant to 28 U.S.C. § 1407 (ECF No. 1) (“Motion to Transfer”). The CA and SCL Defendants agree with the moving Plaintiffs, Plaintiff Rubin (*see* ECF No. 7), the Redmond Plaintiffs (ECF No. 57), and Defendant Facebook, Inc. (“Facebook”) (*see* ECF No. 19) that organizing these cases into an MDL would create substantial efficiencies and avoid inconsistent rulings, and agree that the Northern District of California is the most appropriate transferee district.

II. BACKGROUND

To date, seventeen putative consumer class actions have been filed in seven federal districts against certain CA or SCL Defendants since March 20, 2018¹:

A. Northern District of California:

- i. *Beiner v. Facebook, Inc.*, No. 3:18-CV-1953 (N.D. Cal.) (filed Mar. 29, 2018) (Corley, M.J.)
- ii. *Gennock v. Facebook, Inc.*, No. 3:18-CV-01891 (N.D. Cal.) (filed Mar. 27, 2018) (Ryu, M.J.)

¹ There are five additional cases subject to the Motion to Transfer which do not name any CA or SCL Defendants: *Joshua Iron Wing v. Facebook, Inc.*, No. 3:18-cv-02122 (N.D. Cal.) (filed April 6, 2018); *Johnson v. Facebook, Inc.*, No. 3:18-cv-02127 (N.D. Cal.) (filed April 9, 2018); *Buckles v. Facebook, Inc.*, No. 4:18-cv-02189 (N.D. Cal) (filed Apr. 12, 2018); *Karon v. Facebook*, No. 5:18-cv-01929 (N.D. Cal.) (filed Mar. 29, 2018); and *Burton v. Facebook, Inc. et al.*, No. 2:18-cv-02105 (C.D. Ill.) (filed Apr. 12, 2018).

- iii. *Haslinger v. Facebook, Inc.*, No. 3:18-CV-01984 (N.D. Cal.) (filed Mar. 30, 2018) (Rogers, J.)
- iv. *Kooser v. Facebook, Inc.*, No. 3:18-cv-02009 (N.D. Cal.) (filed Apr. 2, 2018) (Laporte, M.J.)
- v. *Labajo v. Facebook, Inc.*, No. 4:18-CV-02093 (N.D. Cal.) (filed Apr. 5, 2018) (Westmore, M.J.)
- vi. *O'Kelly v. Facebook, Inc.*, No. 3:18-CV-01915 (N.D. Cal.) (filed Mar. 28, 2018) (Laporte, M.J.)
- vii. *Picha v. Facebook, Inc.*, No. 3:18-CV-02090 (N.D. Cal.) (filed Apr. 5, 2018) (Kim, M.J.)
- viii. *Price v. Facebook, Inc.*, No. 3:18-CV-01732 (N.D. Cal.) (filed Mar. 20, 2018) (Chhabria, J.)
- ix. *Rubin v. Facebook, Inc.*, No. 3:18-CV-01852 (N.D. Cal.) (filed Mar. 26, 2018) (Spero, M.J.)
- x. *King v. Facebook, Inc.*, No. 3:18-cv-02276 (N.D. Cal.) (filed Apr. 16, 2018) (Laporte, M.J.)

B. Northern District of Illinois:

- i. *Comforde v. Cambridge Analytica*, No. 1:18-CV-02120 (N.D. Ill.) (filed Mar. 22, 2018) (Bucklo, J.)
- ii. *People of the State of Illinois v. Facebook, Inc.*, No. 1:18-cv-026667 (N.D. Ill.) (filed Mar. 23, 2018; removed Apr. 12, 2018) (Dow, J.)

C. Southern District of Texas:

- i. *Lodowski v. Facebook, Inc.*, No. 4:18-CV-00907 (S.D. Tex.) (filed Mar. 23, 2018) (Ellison, J.)

D. District of New Jersey:

- i. *Malskoff v. Facebook, Inc.*, No. 2:18-CV-04451 (D.N.J.) (filed Mar. 27, 2018) (Salas, J.)

E. Central District of California:

- i. *O'Hara v. Facebook, Inc.*, No. 8:18-CV-00571 (C.D. Cal.) (filed Apr. 4, 2018) (unassigned)

F. Northern District of Alabama:

- i. *Williams v. Facebook, Inc.*, No. 2:18-CV-00535-RDP (N.D. Ala.) (filed Apr. 4, 2018) (Proctor, J.)

G. District of Delaware:

- i. *Redmond v. Facebook, Inc.*, No. 1:18-cv-00531-VAC-MPT (D. Del.) (filed Apr. 10, 2018) (assigned to Vacant Judgeship)

There is substantial overlap among the actions with respect to the parties. Each of these actions names Facebook and certain CA or SCL Defendants as defendants. Each action seeks recovery on behalf of Facebook users whose data allegedly was obtained via Aleksandr Kogan's app, "thisisyourdigitallife," and each action seeks to certify nationwide classes of Facebook users whose data was allegedly not sufficiently protected by Facebook and allegedly obtained and used by Cambridge Analytica and other actors without authorization. The CA and SCL Defendants agree with Facebook that all of the putative classes appear to suffer from the same weaknesses that will make class certification impossible, including the common struggle to identify any cognizable theory of injury or damages, and the myriad individualized issues, including issues of consent, that will predominate over any classwide concerns. Thus, class certification proceedings should be handled and coordinated in a single MDL proceeding.

Furthermore, the legal theories and causes of action asserted in the various complaints also substantially overlap. Sixteen of the actions allege common-law torts and/or related privacy-law claims.² Thirteen actions allege federal causes of action under the Stored

² Negligence (*Comforte, Lodowski, Malskoff, O'Kelly, Price, Rubin, Haslinger, Kooser, O'Hara, Williams, Labajo, Picha, Redmond, and King*); willful negligence (*Redmond*); invasion of privacy, under several theories (*Comforte, Gennock, O'Kelly, Rubin, Beiner, Haslinger, Kooser, O'Hara, Picha, and King*); conversion (*Beiner, Kooser, O'Hara, Williams, Picha, and King*); civil conspiracy (*Beiner, Kooser, and Williams*); fraudulent misrepresentation (*O'Kelly, Kooser, and Redmond*); breach of contract (*King*); and misappropriation of valuable property without compensation (*Labajo*).

Communications Act, 18 U.S.C. § 2701, *et seq.*, or the Wiretap Act, 18 U.S.C. §2510, *et seq.*³

Fourteen actions allege violations of state consumer protection laws.⁴ And all of the cases

involve the same operative allegations: that Facebook lacked measures sufficient to prevent

improper disclosure of user data, that such user data was improperly disclosed, and that

Cambridge Analytica and other actors used data from Facebook's platform for unauthorized

purposes.⁵

Finally, all of these actions are still in the early stages of litigation. Many of the complaints have not yet been served, no responsive pleadings have been filed, and the courts have not yet expended significant resources.

III. ARGUMENT

A. Transfer and Consolidation is Appropriate

Transfer and coordination or consolidation of pretrial proceedings in an MDL is appropriate where: (1) actions pending in different federal courts involve “one or more common questions of fact”; (2) transfer consolidation “will be for the convenience of parties and witnesses and will promote the just and efficient conduct of such actions”; and (3) transfer and

³ *Comforte, Gennock, Lodowski, Malskoff, Beiner, Haslinger, Kooser, O'Hara, Williams, Labajo, Picha, Redmond, and King* each assert claims under 18 U.S.C. § 2701, *et seq.* or 18 U.S.C. § 2510, *et seq.*

⁴ Cal. Bus. & Prof. Code § 17200 (*Lodowski, Malskoff, O'Kelly, Price, Rubin, Beiner, Haslinger, O'Hara, Labajo, Picha, and King*); Illinois Consumer Fraud & Deceptive Practices Act, 815 ILCS 505 (*Comforte and People of Ill.*); N.J. Consumer Fraud Act, N.J. Stat. Ann. § 56:8-1 (*Malskoff*); Ala. Deceptive Trade Practices Act, Ala. Code § 8-19-1 (*Williams*).

⁵ The nearly identical factual allegations all appear to be copied from the same two news reports—March 17, 2018, articles in The New York Times and The Guardian. (See ECF No. 19-1, Appendix A); *see also Redmond v. Facebook, Inc.*, No. 1:18-cv-00531-VAC-MPT (D. Del.) (filed April 10, 2018), ECF No. 1, at ¶ 24 n.12, 25 n.14, 40 n.27 (citing *Guardian* article); *King v. Facebook, Inc.*, No. 3:18-cv-02276-EDL (N.D. Cal.) (filed Apr. 16, 2018), ECF No. 1, at ¶ 40 n.30, 46 n.47 (citing *Guardian* article); *People of the State of Illinois v Facebook, Inc.*, No. 2018-CH-03868 (Ill. Cir. Ct.) (filed Mar. 23, 2018), at ¶ 18, n.8 (citing *New York Times* article), removed Apr. 12, 2018, No. 1:18-cv-02667 (N.D. Ill.).

consolidation will “promote the just and efficient conduct” of pretrial proceedings 28 U.S.C. § 1407(a). Each of these considerations weighs in favor of transfer and consolidation.

1. *The Actions Involve Common Questions of Fact*

As set forth above, not only do these actions involve common questions of fact, they involve nearly identical factual allegations. Indeed, each of the actions alleges that Facebook allowed Kogan to access user data through his app, that the data was given to certain CA or SCL defendants, that those CA or SCL defendants used such data without authorization (including for a presidential election campaign), and that Facebook knew or should have known about the alleged misuse and did not take appropriate measure to remediate the situation. The claims asserted in the various actions also overlap, highlighting the commonality of the underlying factual allegations. Moreover, the cases also propose identical or nearly identical classes: Facebook users whose data was obtained through the Kogan app. Factual issues central to class certification, liability, and damages will therefore be similar across all the cases.

2. *Transfer and Consolidation Will Be For the Convenience of Parties and Witnesses*

First, separate litigation of these actions would impose on the parties substantial and duplicative discovery burdens—precisely the types of burdens that Section 1407 is intended to prevent. *See, e.g., In re Starmed Health Pers. FLSA Litig.*, 317 F. Supp. 2d 1380, 1381 (J.P.M.L. 2004). As all of the actions stem from the same operative factual allegations, it is likely that they will share common witnesses, documents, and third-party discovery. Transfer and consolidation is particularly appropriate here, where the cases are numerous, pending in several districts, and likely to be followed by additional actions. *See, e.g., In re Schnuck Markets, Inc., Customer Data Sec. Breach Litig.*, 978 F. Supp. 2d 1379, 1380-81 (J.P.M.L. 2013) (centralizing cases

because there was no “reasonable prospect” that Section 1404 transfer would “eliminate the multidistrict character of the litigation”).

Second, centralization will avoid inconsistent pretrial rulings regarding discovery, dispositive motions, and other pretrial matters. *See, e.g., In re Pineapple Antitrust Litig.*, 342 F. Supp. 2d 1348, 1349 (J.P.M.L. 2004) (consolidating cases to “prevent inconsistent pretrial rulings”). This is particularly important here, where there are putative class actions with overlapping class definitions. “[C]entralization in one district will bring efficiencies to the pretrial proceedings of these actions and will eliminate duplicative discovery and prevent inconsistent pretrial rulings, particularly with respect to class certification.” *In re Imprelis Herbicide Mktg., Sales Practices & Prod. Liab. Litig.*, 825 F. Supp. 2d 1357, 1359 (J.P.M.L. 2011); *accord, e.g., In re Toys ‘R’ Us-Delaware, Inc., FACTA Litig.*, 581 F. Supp. 2d 1377, 1377-78 (J.P.M.L. 2008). Indeed, Section 1407 was “designed” to prevent “pretrial chaos” resulting from “conflicting class action determinations.” *In re Plumbing Fixture Cases*, 298 F. Supp. 484, 492–93 (J.P.M.L. 1968).

Consolidation will make discovery more convenient for the parties and witnesses. Facebook and the CA and SCL defendants will not be forced to respond to multiple different discovery requests in multiple different cases in multiple jurisdictions. Their witnesses can sit for one deposition instead of multiple time-consuming depositions in various different cases. *Cluck v. IKON Office Sols., Inc.*, No. 11-05027-JSW, 2012 WL 1610789, at *2 (N.D. Cal. May 8, 2012) (“Allowing the witnesses to appear once in a single venue is more convenient [than] requiring them to appear multiple times in multiple venues.”). As the majority of the cases (11 out of 18) are located in California, consolidation and transfer to California will be most convenient for most of the parties (and likely their witnesses as well).

3. Transfer and Consolidation Will Promote Just and Efficient Proceedings

Without consolidation, Facebook and the CA and SCL Defendants will be forced to litigate the same issues in at least seventeen separate litigations all over the country. Indeed, there will be separate actions in multiple different jurisdictions litigating over the same proposed nationwide group of users. Such duplicative litigation would be a significant waste of judicial resources and inevitably result in inconsistent rulings on behalf of overlapping proposed classes. Such conflicts are avoided by having a single consolidated action for a unitary putative class.

See In re Texas Gulf Sulphur Sec. Litig., 344 F. Supp. 1398, 1400 (J.P.M.L. 1972) (“We have frequently held that the possibility of inconsistent class action determinations is an important factor favoring transfer.”); *In re Sugar Indus. Antitrust Litig.*, 395 F. Supp. 1271, 1273 (J.P.M.L. 1975) (consolidation necessary for actions with “overlap[ping] or duplicat[ive]” class allegations).

Moreover, without consolidation, Facebook and the CA and SCL Defendants will be forced to engage in substantial duplicative discovery in actions all across the country on different schedules and subject to different local rules. Their witnesses will be forced to sit for deposition in potentially seventeen different cases instead of one. They will be required to brief the same issues in multiple different cases in multiple different jurisdictions. Thus, without consolidation, these defendants will be required to waste a huge amount of resources that would otherwise be conserved.

B. The Actions Should Be Transferred To The Northern District Of California

In selecting an appropriate transferee district, the Panel considers: (1) where most discovery will take place; (2) where the relevant conduct occurred; (3) the procedural stage of each case; and (4) where the plurality of cases have been filed. *See, e.g., In re Treasury Sec.*

Auction Antitrust Litig., 148 F. Supp. 3d 1360, 1361-62 (J.P.M.L. 2015) (transferring to Southern District of New York because all defendants were headquartered there and most of the cases had been filed in that district); *In re Nat'l Football League's "Sunday Ticket" Antitrust Litig.*, 148 F. Supp. 3d 1358, 1359-60 (J.P.M.L. 2015) (transferring to Central District of California because 15 actions had been filed there, defendant maintained its headquarters there, and common evidence would likely be found there). “[T]ransfer under Section 1407 does not require a complete identity or even majority of common factual issues as a prerequisite to transfer.” *In re Ins. Brokerage Antitrust Litig.*, 360 F. Supp. 2d 1371, 1372 (J.P.M.L. 2005). Each of these factors weighs in favor of transfer to the Northern District of California.

1. *Most U.S. Discovery Will Take Place in the Northern District of California and Most Conduct Occurred in the Northern District of California*

Much of the relevant alleged conduct pertains to Facebook’s data protection measures, which are likely implemented at its headquarters in the Northern District of California. Discovery regarding Facebook’s data protection measures therefore are likely to be centered in the Northern District of California, where Facebook is based and most of its relevant witnesses reside. Moreover, Aleksandr Kogan, not any of the CA Defendants, is the party responsible, if any, for misappropriating consumer data and violating Facebook’s terms of service. Thus, to the extent discovery turns to the alleged conduct of the CA Defendants and their use of Facebook user data, relevant documents and witnesses are likely to be located in the U.K. (where Kogan resides) and New York (where Cambridge Analytica is headquartered). However, given the focus of the cases on the insufficiency of Facebook’s data protection measures, the CA Defendants agree with the *Beiner* and *Rubin* plaintiffs and Facebook that the bulk of the relevant evidence will be located in the Northern District of California is appropriate. Facebook itself

acknowledges that many witnesses whom plaintiffs might seek to depose work at Facebook's headquarters in Menlo Park, in the Northern District of California. (ECF 19 at 14.)

2. *No Answers or Responsive Pleadings Have Been Filed*

Here, all of the cases were filed within the last five weeks, the defendants have filed no answers or motions to dismiss, no court has held a Rule 26(f) conference, and no discovery has taken place. *See, e.g., In re Air Crash near Peixoto De Azevada, Brazil* on Sept. 29, 2006, 493 F. Supp. 2d 1374, 1376 (J.P.M.L. 2007).

3. *The Majority of Cases Have Been Filed in the Northern District of California*

Ten out of the seventeen cases filed against the CA or SCL Defendants have been filed in the Northern District of California, weighing in favor of transfer. *See, e.g., In re PepsiCo, Inc., Bottled Water Mktg. & Sales Practices Litig.*, 560 F. Supp. 2d 1348, 1349 (J.P.M.L. 2008) (selecting a transferee district in part because two of four filed actions were already pending there); *In re Fosamax Prods. Liab. Litig.*, 444 F. Supp. 2d 1347, 1349-50 (J.P.M.L. 2006) (15 of 19 actions already pending in transferee district); *In re Holiday Magic Sec. & Antitrust Litig.*, 368 F. Supp. 806, 807 (J.P.M.L. 1973) (per curiam) (two of five cases already pending in transferee district).

4. *Transfer to the Southern District of Texas Would Not Further the Interests of Multidistrict Litigation*

Transferring the actions to the Southern District of Texas, as the *Lodowski* plaintiffs urge, would not further the interests of MDL consolidation. Only one action has been filed in that district, and the *Lodowski* plaintiffs do not assert that any of the relevant documents or witnesses will be located in Texas. The *Lodowski* plaintiffs argue that Houston's geographic location is convenient for the parties. (ECF No. 16-1 at 5-7.) However, Houston's relative proximity to the east coast is substantially outweighed by the travel burdens that would be imposed on all

California-based witnesses, as well as counsel in most of the cases. The Northern District of California is a more appropriate venue because, as the *Beiner* and *Rubin* Plaintiffs argue, travel in and out of the San Francisco Bay Area is facilitated by the three nearby international airports.

C. Alternatives to MDL Are Not Practicable

The Panel has asked the parties to “address what steps they have taken to pursue alternatives to centralization (including, but not limited to, engaging in informal coordination of discovery and scheduling, and seeking Section 1404 transfer of one or more of the subject cases).” (ECF No. 3.)

Given the number of cases across the number of judicial districts, the CA and SCL Defendants believe any alternative to centralization is unworkable. Informal coordination of discovery and scheduling is unlikely to occur across the many different parties. Indeed, as between the CA and SCL Defendants and the plaintiffs in each case, there are over twenty law firms for which such informal coordination would need to occur. There are also seven different districts currently involved, each with different rules governing discovery and scheduling. Seeking a section 1401 transfer of all seventeen cases to the one district is also unworkable given the sheer number of parties. Indeed, at least one plaintiff has already opposed a transfer to the Northern District of California, where the majority of the other cases already reside. (ECF No. 16.)

Thus, an MDL is the most efficient and effective means of avoiding duplication in these cases. Indeed, the Panel has found that centralization is the only way to avoid imposing such duplication: “informal coordination and cooperation among the parties and courts” is not “sufficient to eliminate the potential for duplicative discovery, inconsistent pretrial rulings, and

conflicting discovery obligations.” *In re Generic Pharm. Pricing Antitrust Litig.*, No.

MDL 2724, 2017 WL 4582710, at *2 (J.P.M.L. Aug. 3, 2017).

IV. CONCLUSION

For the foregoing reasons, the CA and SCL Defendants respectfully request that this Panel grant the pending motion to establish an MDL covering the seventeen actions identified involving the CA or SCL Defendants (and any additional related actions that may get filed in the future), and assign the MDL to the Northern District of California for consolidated pretrial proceedings.

Dated: April 20, 2018

Respectfully submitted,

MILBANK, TWEED, HADLEY & MCCLOY LLP

By: /s/ Mark C. Scarsi

Mark C. Scarsi

2029 Century Park East, 33rd Floor

Los Angeles, CA 90067

Tel: (424) 386-4580

Fax: (213) 892-4780

mscarsi@milbank.com

Attorneys for CA and SCL Defendants

BEFORE THE
UNITED STATES JUDICIAL PANEL ON
MULTIDISTRICT LITIGATION

**IN RE: FACEBOOK, INC., CONSUMER
PRIVACY USER PROFILE LITIGATION**

MDL DOCKET NO. 2843

PROOF OF SERVICE

In compliance with Rule 4.1(a) of the Rules of Procedure of the United States Judicial Panel on Multidistrict Litigation, I hereby certify that on April 20, 2018, I caused the foregoing documents to be filed with the Clerk of the Court using the Court's CM/ECF system, which will serve notification of such filing on all counsel of record as follows:

BY CM/ECF:

Matthew I. Knepper Miles N. Clark KNEPPER & CLARK, LLC 10040 W. Cheyenne Avenue, Suite 170-109 Las Vegas, NV 89129 Email: matthew.knepper@knepperclark.com Email: miles.clark@knepperclark.com <i>Attorneys for Plaintiff Sanford Buckles Individually and on Behalf of All Others Similarly Situated</i>	Elizabeth Ann Wagner Seyed Abbas Kazerounian KAZEROUNI LAW GROUP, APC 245 Fischer Ave. Unit D1 Costa Mesa, CA 92626 Email: elizabeth@kazlg.com Email: ak@kazlg.com <i>Attorneys for Plaintiff Sanford Buckles Individually and on Behalf of All Others Similarly Situated</i>
--	---

<p>Joshua B. Swigart HYDE AND SWIGART 2221 Camino Del Rio South, Suite 101 San Diego, CA 92108 Email: josh@westcoastlitigation.com <i>Attorneys for Plaintiff Sanford Buckles Individually and on Behalf of All Others Similarly Situated</i></p>	<p>Matthew M. Loker KAZEROUNI LAW GROUP, APC 1301 East Grand Avenue, Suite 101 Arroyo Grande, CA 93420 Email: ml@kazlg.com <i>Attorneys for Plaintiff Sanford Buckles Individually and on Behalf of All Others Similarly Situated</i></p>
<p>Brian Michael Lutz Kristin Andrea Linsley GIBSON, DUNN & CRUTCHER LLP 555 Mission Street, Suite 3000 San Francisco, CA 94105 Email: BLutz@gibsondunn.com Email: KLinsley@gibsondunn.com <i>Attorneys for Defendants Facebook, Inc.</i></p>	<p>Joshua Lipshutz GIBSON DUNN & CRUTCHER LLP 1050 Connecticut Avenue, NW, 3rd Floor Washington, DC 20036 Email: jlipshutz@gibsondunn.com <i>Attorneys for Defendant Facebook, Inc.</i></p>
<p>Orin Snyder GIBSON DUNN & CRUTCHER LLP 200 Park Avenue New York, NY 10166-0193 Email: osnyder@gibsondunn.com <i>Attorneys for Defendant Facebook, Inc.; Mark Zuckerberg; Sheryl Sandberg</i></p>	<p>Timothy Scott Burton, Jr. 115 Iowa Street Danville, IL 61832 Email: runnerforlife08@gmail.com <i>PRO SE</i></p>
<p>Alyssa M Williams Angela Jae Chun David Seabold Casey , Jr Jeremy K. Robinson Gayle M. Blatt CASEY GERRY SCHENK FRANCAVILLA BLATT & PENFIELD LLP 110 Laurel St San Diego, CA 92101 Email: awilliams@cglaw.com Email: ajc@cglaw.com Email: dcasey@cglaw.com Email: jrobinson@cglaw.com Email: gmb@cglaw.com <i>Attorneys for Plaintiff Lucy Gerena</i></p>	<p>Alfred K. Murray Ari J. Scharg Benjamin H Richman David I. Mindell Jay Edelson EDELSON PC 350 N LaSalle, 14th Floor Chicago, IL 60654 Email: amurray@edelson.com Email: ascharg@edelson.com Email: brichman@edelson.com Email: dmindell@edelson.com Email: jedelson@edelson.com <i>Attorneys for People of the State of Illinois, ex rel. Kimberly M. Foxx State's Attorney of Cook County, Illinois</i></p>

<p>Kent Stephen Ray Cook County States Attorney's Office Daley Ctr. 69 W. Washington Street, Suite 3130 Chicago, IL 60602 Email: kent.ray@cookcountyl.gov <i>Attorneys for People of the State of Illinois, ex rel. Kimberly M. Foxx State's Attorney of Cook County, Illinois</i></p>	<p>Nathan P. Eimer Susan M. Razzano EIMER STAHL LLP 224 South Michigan Avenue, Suite 1100 Chicago, IL 60604 Email: neimer@eimerstahl.com Email: srazzano@eimerstahl.com <i>Attorneys for Defendants Facebook, Inc.</i></p>
<p>Eric H. Gibbs GIBBS LAW GROUP LLP (Oakland, CA Office) 505 14th Street, Suite 1110 Oakland, CA 94612 Email: ehg@classlawgroup.com <i>Attorneys for Plaintiff Patricia King</i></p>	<p>Derek G. Howard DEREK G. HOWARD LAW FIRM, INC. 42 Miller Avenue Mill Valley, CA 94941 Email: derek@derekhowardlaw.com <i>Attorneys for Plaintiff James Karon derivatively on behalf of Facebook, Inc.</i></p>
<p>Larry Wayne Gabriel Daniel Joseph Mulligan JENKINS MULLIGAN & GABRIEL LLP 10085 Carroll Canyon Road, Suite 210 San Diego, CA 92131 Email: lgabriel@bg.law Email: dan@jmglawoffices.com <i>Attorneys for Plaintiff James Karon derivatively on behalf of Facebook, Inc.</i></p>	<p>Patrice L. Bishop STULL, STULL & BRODY 9430 West Olympic Boulevard, Suite 400 Beverly Hills, CA 90212 Email: service@ssbla.com <i>Attorneys for Interested Party Ronald Martin</i></p>
<p>John A. Yanchunis Patrick A. Barthle , II Ryan McGee Morgan & Morgan Complex Litigation Group 201 N. Franklin Street, 7th Floor Tampa, FL 33602 Email: jyanchunis@forthepeople.com Email: pbarthle@forthepeople.com Email: rmcgee@forthepeople.com <i>Attorneys for Plaintiff Lauren Price</i></p>	<p>Joshua H. Watson ARNOLD LAW FIRM 865 Howe Avenue Sacramento, CA 95825 Email: jwatson@justice4you.com <i>Attorneys for Plaintiff Lauren Price and Interested Parties Debra Kooser and Margaret Franiewicz</i></p>

<p>Steven William Teppler Abbott Law Group, P.A. 2929 Plummer Cover Road Jacksonville, FL 32223 Email: steppler@abbottlawpa.com <i>Attorneys for Plaintiff Lauren Price</i></p>	<p>David Taylor Rudolph Melissa Ann Gardner Michael W Sobol LIEFF CABRASER HEIMANN AND BERNSTEIN, LLP 275 Battery Street, 29th Floor San Francisco, CA 94111 Email: drudolph@lchb.com Email: msobol@lchb.com Email: mgardner@lchb.com <i>Attorneys for Interested Parties Theresa Beiner and Brandon Haubert</i></p>
<p>Nicholas Diamand LIEFF CABRASER HEIMANN & BERNSTEIN LLP 250 Hudson Street, 8th Floor New York, NY 10013-1413 Email: ndiamand@lchb.com <i>Attorneys for Plaintiffs Theresa Beiner; Brandon Haubert</i></p>	<p>Francis A. Bottini, Jr. BOTTINI & BOTTINI INC. 7817 Ivanhoe Avenue, Suite 102 La Jolla, CA 92037 Email: fbottini@bottinilaw.com <i>Attorneys for Interested Party Natalie Ocegueda</i></p>
<p>Mark C Molumphy COTCHETT PITRE & MCCARTHY LLP 840 Malcolm Road, Suite 200 Burlingame, CA 94010 Email: mmolumphy@cpmlegal.com <i>Attorneys for Interested Party Jeremiah F. Hallisey</i></p>	<p>Robert Frank Lopez Steve W. Berman HAGENS BERMAN SOBOL SHAPIRO LLP 1918 8th Avenue, Suite 3300 Seattle, WA 98101 Email: robl@hbsslaw.com Email: steve@hbsslaw.com <i>Attorneys for Plaintiff Carol Johnson; Daniel Paul; Steve Mortillaro individually and on behalf of all others similarly situated</i></p>
<p>Daniel E. Barenbaum BERMAN TABACCO 44 Montgomery Street, Suite 650 San Francisco, CA 94104 Email: dbarenbaum@bermantabacco.com <i>Attorneys for Gloria Stricklin Trust</i></p>	<p>Nicholas A Carlin Brian S. Conlon PHILLIPS, ERLEWINE, GIVEN & CARLIN 39 Mesa Street, Suite 201 The Presidio San Francisco, CA 94129 Email: nac@phillaw.com Email: bsc@phillaw.com <i>Attorneys for Jonathan D. Rubin individually and on behalf of all those similarly situated; Interested Party Jonathan D. Rubin</i></p>

<p>Norman E. Siegel Stueve Siegel Hanson LLP 460 Nichols Road, Suite 200 Kansas City, MO 64112 Email: siegel@stuevesiegel.com</p> <p><i>Attorneys for Howard O'Kelly on behalf of himself and all others similarly situated</i></p>	<p>Jason S Hartley STUEVE SIEGEL HANSON LLP 550 West C Street, Suite 1750 San Diego, CA 92101 Email: hartley@stuevesiegel.com</p> <p><i>Attorneys for Howard O'Kelly on behalf of himself and all others similarly situated</i></p>
<p>Allen Carney Hank Bates David F. Slade James Allen Carney, Jr. CARNEY BATES & PULLIAM PLLC 519 West 7th Street Little Rock, AR 72201 Email: acarney@cbplaw.com Email: hbates@cbplaw.com Email: dslade@cbplaw.com Email: ACarney@cbplaw.com</p> <p><i>Attorneys for Plaintiffs Theresa Beiner; Brandon Haubert</i></p>	<p>Shana E. Scarlett HAGENS BERMAN SOBOL SHAPIRO LLP 715 Hearst Avenue, Suite 202 Berkeley, CA 94710 Email: shanas@hbsslaw.com</p> <p><i>Attorneys for Plaintiff Carol Johnson; Daniel Paul; Steve Mortillaro individually and on behalf of all others similarly situated</i></p>
<p>Korula T Cherian Rebecca Ruby Anzidei Richard W. Fields Richard Ripley Robert Francis Ruyak RUYAKCHERIAN LLP - Berkley 1700 K Street NW, Suite 810 Washington, DC 20006 Email: sunnyc@ruyakcherian.com Email: rebecca@ruyakcherian.com Email: Fields@fieldslawpllc.com Email: rickr@ruyakcherian.com Email: robertr@ruyakcherian.com</p> <p><i>Attorneys for Plaintiffs Ben Redmond; Lindsay Rathert; Salvador Ramirez; Gerry Galipault; Kyle Westendorf; Robert Woods; Jordan Hunstone Individually and on behalf of all others similarly situated</i></p>	<p>Adam Russell Credeur Kenneth W. DeJean LAW OFFICES OF KENNETH W. DEJEAN P.O. Box 4325 Lafayette, LA 70502 Email: adam@kwdejean.com Email: kwdejean@kwdejean.com</p> <p><i>Attorneys for Plaintiffs Ashley Gennock; Randy Nunez</i></p>

<p>Gary F. Lynch Kelly Kathleen Iverson CARLSON LYNCH SWEET & KILPELA, LLP 1133 Penn Avenue, Fifth Floor Pittsburgh, PA 15222 Email: glynch@carlsonlynch.com <i>Attorneys for Plaintiffs Ashley Gennock; Randy Nunez</i></p>	<p>Karen Hanson Riebel Kate M. Baxter-Kauf LOCKRIDGE GRINDAL NAUEN PLLP 100 Washington Avenue South, Suite 2200 Minneapolis, MN 55401-2159 Email: Khriebel@locklaw.com Email: kmbaxter-kauf@locklaw.com <i>Attorneys for Plaintiffs Ashley Gennock; Randy Nunez</i></p>
<p>Todd D. Carpenter CARLSON LYNCH SWEET KILPELA & CARPENTER, LLP 1350 Columbia St., Suite 603 San Diego, CA 92101 Email: tcarpenter@carlsonlynch.com <i>Attorneys for Plaintiff Ashley Gennock</i></p>	<p>James Constantine Vlahakis Joseph Scott Davidson SULAIMAN LAW GROUP, LTD. 2500 S. Highland Avenue, Suite 200 Lombard, IL 60148 Email: jvlahakis@sulaimanlaw.com Email: jdavidson@sulaimanlaw.com <i>Attorneys for Plaintiffs Victor James Comforde, II and Brendan Michael Carr individually and on behalf of all others similarly situated</i></p>
<p>William Craft Hughes HUGHES ELIZEY LLP 2700 Post Oak Boulevard Galleria Tower I, Suite 1120 Houston, TX 77056-5767 Email: craft@hugesellzey.com <i>Attorneys for Plaintiff Matthew Lodowski</i></p>	<p>Stephen A Weiss SEAGER WEISS LLP 55 Challenger Road, 6th Floor Ridgefield Park, NJ 07660 Email: sweiss@seegerweiss.com <i>Attorneys for Plaintiffs Jay Malskoff and Kenneth Irvine Individually and on behalf of all others</i></p>
<p>James E Cecchi CARELLA BYRNE CECCHI OLSTEIN BRODY & AGNELLO 5 Becker Farm Road Roseland, NJ 07068-1727 Email: jcecchi@carellabyrne.com <i>Attorneys for Plaintiffs Jay Malskoff and Kenneth Irvine Individually and on behalf of all others</i></p>	<p>Christopher Londergan Springer KELLER ROHRBACK L.P. 801 Garden Street Santa Barbara, CA 93101 Email: cspringer@kellerrohrback.com <i>Attorneys for Plaintiff Suzie Haslinger individually and on behalf of all others similarly situated</i></p>

<p>Gretchen F. Cappio Cari C. Laufenberg Lynn Lincoln Sarko KELLER ROHRBACK LLP 1201 Third Avenue, Suite 3200 Seattle, WA 98101-3052 Email: gcappio@kellerrohrback.com Email: claufenberg@kellerrohrback.com Email: lsarko@kellerrohrback.com <i>Attorneys for Plaintiff Suzie Haslinger individually and on behalf of all others similarly situated</i></p>	<p>Matthew Jury MCCUE & PARTNERS, LLP 158 Buckingham Palace Road Fourth Floor London SW1W 9TR United Kingdom Email: matthew.jury@mccue-law.com <i>Attorneys for Plaintiffs Ben Redmond; Lindsay Rathert; Salvador Ramirez; Gerry Galipault</i></p>
<p>Kevin S. Hannon HANNON LAW FIRM LLC 1641 Downing Street Denver, CO 80218-1528 Email: khannon@hannonlaw.com <i>Attorneys for Plaintiffs Debra Kooser; Margaret Frankiewicz on behalf of themselves and all others similarly situated</i></p>	<p>Aidan C McGlaze Paul L. Hoffman SCHONBRUN SEPLOW HARRIS AND HOFFMAN LLP 11543 West Olympic Boulevard Los Angeles, CA 90064 Email: amcglaize@sshhlaw.com Email: phoffman@sshhlaw.com <i>Attorneys for Plaintiffs Jordan O'Hara and Olivia Johnson individually and on behalf of all others similarly situated; Brent Collins</i></p>
<p>Amy Christine Johnsgard Andrew J Kubik Ben Travis Helen Zeldes Coast Law Group LLP 1140 South Coast Highway 101 Encinitas, CA 92024 Email: amy@coastlaw.com Email: andy@coastlawgroup.com Email: ben@coastlaw.com Email: helen@coastlaw.com <i>Attorneys for Plaintiffs Jordan O'Hara and Olivia Johnson individually and on behalf of all others similarly situated; Brent Collins</i></p>	<p>Charles J. LaDuka Cuneo Gilbert & LaDuka, LLP 4725 Wisconsin Ave., NW, Suite 200 Washington, DC 20016 Email: charlesl@cuneolaw.com <i>Attorneys for Plaintiffs Jordan O'Hara and Olivia Johnson individually and on behalf of all others similarly situated; Brent Collins</i></p>

<p>Michael J Flannery Cuneo Gilbert & Laduca, LLP 7733 Forsyth Boulevard, Suite 1675 St. Louis, MO 63105 Email: mflannery@cuneolaw.com</p> <p><i>Attorneys for Plaintiffs Jordan O'Hara and Olivia Johnson individually and on behalf of all others similarly situated; Brent Collins</i></p>	<p>Christopher P Simon David Gerard Holmes CROSS & SIMON LLC 1105 North Market Street, Suite 901 Wilmington, DE 19801 Email: csimon@crosslaw.com Email: dholmes@crosslaw.com</p> <p><i>Attorneys for Plaintiffs Ben Redmond; Lindsay Rathert; Salvador Ramirez; Gerry Galipault</i></p>
<p>Thomas J. O'Reardon BLOOD HURST & O'REARDON LLP 701 B Street, Suite 1700 San Diego, CA 92101 Email: toreardon@bholaw.com</p> <p><i>Attorneys for Plaintiffs Jordan O'Hara and Olivia Johnson individually and on behalf of all others similarly situated; Brent Collins</i></p>	<p>J Bradley Ponder MONTGOMERY PONDER, LLC 2226 1st Avenue South, Unit 105 Birmingham, AL 35233 Email: brad@montgomeryponder.com</p> <p><i>Attorneys for Plaintiff Jackie Williams on behalf of herself and all others similarly situated</i></p>
<p>Lucas C Montgomery MONTGOMERY PONDER LLC 2421 2nd Ave North, Unit 1 Birmingham, AL 35203 Email: luke@montgomeryponder.com</p> <p><i>Attorneys for Plaintiff Jackie Williams on behalf of herself and all others similarly situated</i></p>	<p>Gordon M Fauth, Jr. Rosanne L Mah FINKELSTEIN THOMPSON LLP 100 Pine Street, Suite 1250 San Francisco, CA 946111 Email: gfauth@finkelsteinthompson.com Email: rmah@finkelsteinthompson.com</p> <p><i>Attorneys for Plaintiff Christian Labajo an Individual, on behalf of herself and all others similarly situated</i></p>

<p>Andrew Arnold Ann Ritter Annie Kouba Fred Baker Jodi Westbrook Flowers Kimberly Barone Baden MOTLEY RICE LLC 28 Bridgeside Boulevard Mt. Pleasant, SC 29464-4375 Email: aarnold@motleyrice.com Email: aritter@motleyrice.com Email: akouba@motleyrice.com Email: fbaker@motleyrice.com Email: jflowers@motleyrice.com Email: kbarone@motleyrice.com <i>Attorneys for Plaintiff Taylor Picha individually and on behalf of all others similarly situated</i></p>	<p>Shawn D. Morris William Allan Lemkul MORRIS SULLIVAN AND LEMKUL LLP 9915 Mira Mesa Boulevard, Suite 300 San Diego, CA 92131 Email: morris@morriessullivanlaw.com Email: lemkul@morriessullivanlaw.com <i>Attorneys for Plaintiff Taylor Picha individually and on behalf of all others similarly situated</i></p>
<p>Anthony L. Parkhill Ben Barnow Erich Paul Schork Jeffrey Daniel Blake BARNOW AND ASSOCIATES, P.C. One N. LaSalle Street, Suite 4600 Chicago, IL 60602 Email: aparkhill@barnowlaw.com Email: b.barnow@barnowlaw.com Email: e.schork@barnowlaw.com Email: j.blake@barnowlaw.com <i>Attorneys for Joshua Iron Wing; Ryan McGrath</i></p>	<p>Thomas J. O'Reardon, II Timothy Gordon Blood Paula R Brown Paula Michelle Roach BLOOD HURST & O'REARDON, LLP 501 W. Broadway, Suite 1490 San Diego, CA 92101 Email: toreardon@bholaw.com Email: tblood@bholaw.com Email: pbrown@bholaw.com <i>Attorneys for Plaintiffs Jordan O'Hara and Olivia Johnson individually and on behalf of all others similarly situated; Brent Collins; Attorneys for Joshua Iron Wing; Ryan McGrath</i></p>

I further certify that copies of the foregoing were served on all unrepresented parties and on the Clerk of the Court for each proposed transferor court, by U.S. Mail, as follows:

<u>By U.S. Mail:</u>	
Susan Y. Soong, Clerk San Francisco Division United States District Court 450 Golden Gate Avenue Box 36060 San Francisco CA 94102	<i>Kooser et al. v. Facebook, Inc. et al.</i> , Northern District of California, Case No. 4:18-cv-02009
Susan Y. Soong, Clerk Oakland Division United States District Court 1301 Clay Street, Suite 400S Oakland, CA 94612	<i>Rubin et al. v. Facebook, Inc. et al., Cambridge Analytica LLC</i> , Northern District of California, Case No. 3:18-cv-01852
	<i>Labajo et al. v. Facebook, Inc. et al.</i> , Northern District of California, Case No. 4:18-cv-02093
	<i>Picha et al. v. Facebook, Inc. et al.</i> , Northern District of California, Case No. 3:18-cv-02090
	<i>Haslinger et al. v. Facebook, Inc. et al.</i> , Northern District of California, Case No. 3:18-cv-01984
	<i>Beiner et al. v. Facebook, Inc. et al.</i> , Northern District of California, Case No. 3:18-cv-01953
	<i>O'Kelly et al. v. Facebook, Inc. et al., LLC</i> , Northern District of California, Case No. 3:18-cv-01915
	<i>Gennock et al. v. Facebook, Inc. et al.</i> , Northern District of California, Case No. 3:18-cv-01891
	<i>Price v. Facebook, Inc. and Cambridge Analytica</i> , Northern District of California, Case No. 3:18-cv-01732
	<i>Joshua Iron Wing and Ryan McGrath v. Facebook, Inc.</i> , Northern District of California, Case No. 3:18-cv-02122
	<i>Johnson et al. v. Facebook, Inc.</i> , Northern District of California, Case No. 3:18-cv-02127
	<i>Buckles v. Facebook, Inc. et al.</i> , Northern District of California, Case No. 4:18-cv-02189

	<p><i>Gerena v. Facebook, Inc.</i>, Northern District of California, Case No. 3:18-cv-02201</p> <p><i>Karon v. Facebook, Inc.</i>, Northern District of California, Case No. 5:18-cv-01929</p> <p><i>King v. Facebook, Inc. et al.</i>, Northern District of California, Case No. 3:18-cv-02276</p>
John A. Cerino, Clerk of the Court Office of the Clerk United States District Court 844 North King Street Unit 18 Wilmington, DE 19801-3570	<i>Redmond et al. v. Facebook, Inc. et al.</i> , District of Delaware, Case No. 1:18-cv-00531
Clerk of Court Hugo L. Black United States Courthouse 1729 5th Avenue North Birmingham, AL 35203	<i>Williams et al. v. Facebook, Inc. et al.</i> , Northern District of Alabama, Case No. 2:18-cv-00535
Kiry Gray, Clerk Southern Division Central Division of California 411 West 4th Street, Room 1053 Santa Ana, CA 92701	<i>O'Hara et al. v. Facebook, Inc. et al.</i> , Central District of California, Case No. 8:18-cv-00571
William T. Walsh, Clerk Newark Division Martin Luther King Building & U.S. Courthouse 50 Walnut Street Newark, NJ 07101	<i>Malskoff et al. v. Facebook, Inc. et al.</i> , District of New Jersey, Case No. 2:18-cv-04451
David J. Bradley, Clerk Houston Division United States Courthouse 515 Rusk Avenue Houston, TX 77002	<i>Lodowski v. Facebook, Inc. et al.</i> , Southern District of Texas, Case No. 4:18-cv-00907
Thomas G. Bruton, Clerk Chicago Division Everett McKinley Dirksen United States Courthouse 219 South Dearborn Street Chicago, IL 60604	<i>Comforde et al. v. Cambridge Analytica et al.</i> , Northern District of Illinois, Case No. 1:18-cv-02120

By U.S. Mail:

Global Science Research Ltd. 6th Floor 49 Peter Street, Manchester, England, M2 3NG	Stephen K. Bannon 210 A Street, N.E. Washington, DC 20002 Last Known Address
Robert Leroy Mercer 149 Harbor Rd. Saint James, NY 11780	Stephen K. Bannon 82 Heritage Hill Rd New Canaan, CT 06840 Last Known Address
Aleksandr Kogan University of Cambridge, Dept. of Psychology Downing Street Cambridge, UK CB2 3EB	

Dated: April 20, 2018

Respectfully Submitted,

/s/ Mark C. Scarsi

Mark C. Scarsi

MILBANK, TWEED, HADLEY & McCLOY LLP

2029 Century Park East, 33rd Floor

Los Angeles, California 90067

Telephone: 424-386-4580

Fax: 213-892-4750

Email: mscarsi@milbank.com

*Attorneys for Cambridge Analytica LLC,
Cambridge Analytica Holdings LLC, Cambridge
Analytica Political LLC, Cambridge Analytica (UK)
Ltd., Cambridge Analytica Commercial LLC, SCL
Elections Ltd., SCL Group Ltd., SCL USA Inc.*